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July 30, 1993

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
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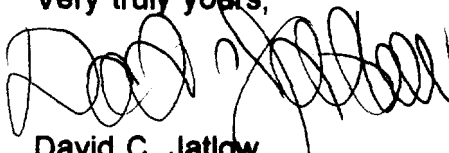
In re: PR Docket No. 92-235
Reply Comments of Ericsson GE Mobile Communications, Inc. and
The Ericsson Corporation

Dear Mr. Caton:

Transmitted herewith on behalf of Ericsson GE Mobile Communications, Inc.
and The Ericsson Corporation, is an original and nine copies of their comments for
filing in the above-referenced proceeding.

Should there be any questions with regard to this matter, kindly communicate
directly with the undersigned.

Very truly yours,



David C. Jatlow
Counsel for Ericsson GE Mobile
Communications, Inc. and The
Ericsson Corporation

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JUL 30 1993

Before the
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Replacement Of Part 90 By) PR Docket No. 92-235
Part 88 To Revise The Private)
Land Mobile Radio Services)
And Modify The Policies)
Governing Them)
)

To: The Commission

**Reply Comments of Ericsson GE Mobile Communications, Inc.
And The Ericsson Corporation**

Ericsson GE Mobile Communications, Inc. and The Ericsson Corporation (collectively referred to herein as "Ericsson"), by its attorney, hereby submit its reply comments in the above-captioned proceeding. In support thereof, Ericsson states as follows:

As stated in its comments submitted in this proceeding on May 28, 1993¹, Ericsson supports the Commission's goal of adopting rules which will "refarm" the Private Land Mobile Radio ("PLMR") spectrum below 512 MHz. Ericsson believes it is important for the PLMR community to be able to achieve a net gain in spectrum utilization by use of efficient technologies in this presently overcrowded band to provide state of the technology

¹ Comments of Ericsson GE Mobile Communications, Inc. and The Ericsson Corporation, submitted in PR Docket No. 92-235, May 28, 1993 (hereinafter "Ericsson Comments").

voice and high speed data services. Though Ericsson supports the Commission's proposal to adopt a spectrum efficiency standard to accomplish its goal, it does not believe the Commission's approach to the refarming issue will result in the most efficient use of spectrum. Indeed, Ericsson believes the Commission's proposal to achieve spectrum efficiency by splitting existing 25 kHz and 30 kHz channels into very narrowband 6.25 kHz and 5 kHz channels ("VNB") will be counterproductive to its ultimate goal and to the PLMR community.

Though the Commission asserts that the first step towards implementation of VNB technology is a simple reduction in transmitter deviation to create pseudo-12.5 kHz systems, comments filed in this proceeding show that the Commission underestimated the magnitude of its proposal and the impact on the 12,000,000 existing PLMR licensees and end users. Ericsson estimated the cost to the PLMR community just to reduce transmitter deviation by 1996 will exceed \$1.5 billion dollars.² Others filing comments asserted that the costs of the Commission's proposals would be significant.³ Notwithstanding the foregoing, the reduction in transmitter deviation and the introduction of VNB

² Ericsson Comments, pp. 5-8.

³ See, for example, comments of American Petroleum Institute; Motorola; Coalition of Industrial and Land Transportation Land Mobile Radio Users; Bell Atlantic Personal Communications, Inc.; APCO; E.F. Johnson; TIA; State of New York County of Hamilton Supervisors Chambers; County of Los Angeles; Office of the Sheriff, Maricopa County, Arizona; and Arizona Department of Transportation.

equipment without a corresponding requirement to change other components in presently existing PLMR equipment, including receivers, will negate any theoretical capacity gains caused by the reduction in deviation and is certain to cause interference to existing equipment. Further, after the transmitter deviation reduction and corresponding adjustments are made, the PLMR community will still have to purchase entirely new, VNB systems.

A review of the overwhelming majority of comments submitted in this proceeding supported these views and urged the Commission

~~to consider the possibility of requiring the use of the same~~

Because highly efficient, non-VNB technologies exist in the marketplace today, Ericsson believes the Commission's goals of refarming the PLMR band below 512 MHz can be accomplished if it adopts rules which support the following four concepts:

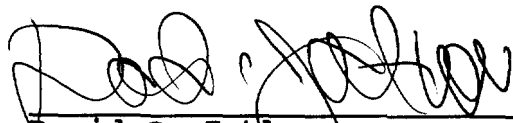
First, the FCC, in conjunction with an industry group composed of all interested members of the public, should adopt a spectrum efficiency standard designed to provide a real increase in spectrum efficiency to a level which is the equivalent of at least 4 communications links per 25 kHz analog channel.

Second, the FCC should adopt rules which support flexibility and which allows the PLMR user to determine the particular technology which best suits its needs and which does not discriminate against any type of digital system. Such rules should include a reduction in the number of band classes as well as stacking of contiguous channels within each band to permit wideband or VNB systems to be easily implemented.

Third, the FCC should adopt rules to require the use of

PLMR users are subject to adverse interference from unproven technical concepts or significant costs due to the necessity of replacing entire systems.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "David C. Jatlow", is written over a horizontal line.

David C. Jatlow
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Ericsson Corporation

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July 30, 1993

CERTIFICATE OF SERVICE

I, David C. Jatlow, hereby certify that, on this 30th day of July 1993, copies of the foregoing Reply Comments were sent postage paid first class mail to the following:

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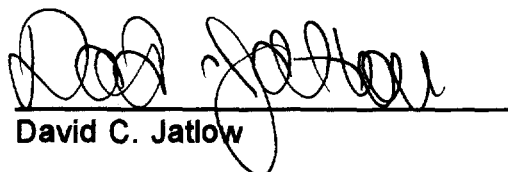
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